IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re Chapter 11

Case No. 23-10831 (MFW)

Lordstown Motors Corp., et al., (Jointly Administered)

Debtors. Hearing Date: Nov. 21, 2023 at 11:30 a.m. (ET)
Objection Deadline: Nov. 14, 2023 at 4:00 p.m. (ET)

NOTICE OF APPLICATION OF THE DEBTORS FOR AN ORDER UNDER 11 U.S.C. §§ 327(A) AND 328(A), FED. R. BANKR. P. 2014 AND 2016, AND DEL. BANKR. L.R. 2014-1 AND 2016-1 AUTHORIZING AND APPROVING THE EMPLOYMENT AND RETENTION OF WOMBLE BOND DICKINSON (US) LLP AS CO-COUNSEL NUNC PRO TUNC TO OCTOBER 6, 2023

PLEASE TAKE NOTICE that, on October 31, 2023, the debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors") filed the *Application of the Debtors for an Order Under 11 U.S.C. §§ 327(a) and 328(a), Fed. R. Bankr. P. 2014 and 2016, and Del. Bankr. L.R. 2014-1 and 2016-1 Authorizing and Approving the Employment and Retention of Womble Bond Dickinson (US) LLP as Co-Counsel Nunc Pro Tunc to October 6, 2023* (the "Application") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that, any responses or objections to the Application must be in writing and filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before November 14, 2023 at 4:00 p.m. (prevailing Eastern Time).

The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

PLEASE TAKE FURTHER NOTICE that, if any objections to the Application are received, the Application and such objections shall be considered at a hearing before The Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 5th Floor, Courtroom 4, Wilmington, Delaware 19801 on November 21, 2023 at 11:30 a.m. (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE APPLICATION ARE TIMELY FILED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

[Remainder of Page Intentionally Left Blank]

Dated: October 31, 2023 Wilmington, Delaware

/s/ Morgan L. Patterson

WOMBLE BOND DICKINSON (US) LLP

Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200

Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com

Proposed Counsel to the Debtors and Debtors in Possession

WHITE & CASE LLP

Thomas E Lauria (admitted *pro hac vice*) Matthew C. Brown (admitted *pro hac vice*) Fan B. He (admitted *pro hac vice*) 200 South Biscayne Boulevard, Suite 4900

Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com

fhe@whitecase.com

David M. Turetsky (admitted pro hac vice)

1221 Avenue of the Americas

New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com

Jason N. Zakia (admitted *pro hac vice*) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)
Doah Kim (admitted *pro hac vice*)
RJ Szuba (admitted *pro hac vice*)
555 South Flower Street, Suite 2700
Los Angeles, CA 90071
Telephone: (213) 620-7700
rkampfner@whitecase.com
doah.kim@whitecase.com

Counsel to Debtors and Debtors in Possession

rj.szuba@whitecase.com